



California/Nevada Community Action Partnership



Helping People. Changing Lives.

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Cal/Neva is the member Association of California and Nevada Community Action Agencies (CAAs) and other non-profit organizations, that together deliver human services to more than 4 million low-income Californians annually.

SAVE CSBG!

(Templates and Sample Impact Statements)

THANK YOU! BUT OUR WORK CONTINUES...

On Thursday, April 14, 2011 the Senate joined the House of Representatives in voting to keep the government funded until September 30, 2011. For the 2011 Federal budget, the **Community Services Block Grant (CSBG)**, the central source of funding for Community Action Agencies in the United States was reduced by 2.9% to \$680 million. While Community Action has crossed its first budget hurdle with minimal cuts, **there will be many more to come.**

THE 2012 BUDGET BATTLE

The Administration and Congress are still proposing devastating cuts and changes to Community Action for fiscal year 2012 (FY12) beginning October 1, 2011. These cuts will dismantle the Community Action Network that millions of citizens rely on. Anti-poverty agencies nationwide will be hit hard if these changes go through. More important, critical services for low-income families will be lost.

WHY SAVE COMMUNITY ACTION?

CSBG is the **ONLY federal program focused on comprehensive services to fight poverty**. If it is eliminated, more than a thousand Community Action Agencies across the country will be forced to slash programs, or even to shut their doors.

YOU CAN HELP MAKE A DIFFERENCE!

It is essential that President Obama and the Congress hear from communities all across America. We need to let our national leaders know that Community Action is important to us. You can call or email the President and your representatives in Congress. Tell them how Community Action has made a difference in your life. And encourage others to do the same!

CAA/CSBG FUNDED AGENCIES FUTURE IS IN YOUR HANDS....ACT NOW!

Cal/Neva is Fulfilling The Promise of Community Action!

MAY IS COMMUNITY ACTION MONTH!

UPCOMING EVENTS

August 22, 2011 ~ Cal/Neva Leadership Institute

NEED ASSISTANCE?

Go to your local Community Action Agency

JOB OPPORTUNITIES

Updated often!

ASSET BUILDING

EITC Awareness

CAA NEWS

Latest CAA Activities



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News

Latest News **SAVE CSBG**

CAA/CSBG FUNDED AGENCIES ARE IN SERIOUS JEOPARDY! THERE ARE PROPOSED CUTS TO COMMUNITY SERVICE BLOCK GRANT (CSBG) FUNDING.

HERE IS WHAT YOU CAN DO:

Today!!! Write letters, make phone calls and send emails to the President and your federal elected officials. It is especially important for Community Leaders (business owners/executives, local officials, religious community, veterans affairs) to be part of the message.

Send to David Bradley at NCAF (dataformcaf@gmail.com) the following information:

Part I: Damage Assessment/CAA Profile

Part II: Local Community Impact Piece

Part III: Your CAAs' role in addressing any of these six issues: Americans still believe government works in these areas

Your time and dedication to this very important project is appreciated. For those of you who are still working on your responses, to make it easier, links are included here to template examples that CAAs have graciously allowed us to share with you.

We hope these samples will assist you in your responses:

Damage Assessment

Impact Statement 1

Impact Statement 2

Resource List

Media Packet

Resolution Template

Community Partner Letter Sample

Elected Official Letter Template

"FIGHTING THE WAR THAT NEVER ENDS"

National Journal Daily - Wednesday February 16
Interview with Don Mathis, nCAP

INTERVIEW WITH DON MATHIS, nCAP

Don Mathis, President and CEO of the national Community Action Partnership, appeared on C-SPAN's Washington Journal on February 9 discussing the proposed cuts to the Community Services Block Grant (CSBG) and the positive impact Community Action has on local communities.

California EITC & Asset Building Collaborative



vision

Within the next 3 years grow (the collaborative) into a successful statewide EITC programming/asset development coalition providing training and technical assistance, and public awareness to improve financial opportunities for Californians. This will be accomplished by building strong partnerships and increasing the capacity of organizations to provide programs and services that support savings, maximize income and tax credits to build assets, improve credit and reduce debt.



mission

Improve financial health for Californians by raising public awareness, building organizational capacity and improving public policy of asset development.



objectives

- 1) Add at least 400,000 new families collecting EITC tax credit by 12/31/12.
- 2) Increase funding for the coalition from 0 to \$150K by 12/31/11.
- 3) Build the collaborative membership from 25 to 50 by 12/31/11.
- 4) Increase the number of free tax returns completed x to x by 12/31/11.



strategies

- 1) Raise public awareness through media, marketing, working with the legislature and outreach.
- 2) Build practitioner capacity through networking, training, fundraising, information and resource sharing.
- 3) Advocate public policy that facilitates asset development at the city, county and state levels.
- 4) Establish a strong infrastructure for the collaborative with an established administrator, committees, advisory committee and funding to support the activities of the coalition and their members.
- 5) Develop a strong and diverse collaborative through open recruitment and transparent communication.
- 6) Develop policies that would benefit working families including statewide EITC
- 7) Develop the capacity of regional coalitions through networking, peer support, training, t.a.



action plans

- 1) Establish a steering committee for the collaborative by April 30, 2011.
- 2) Provide a statewide conference on asset bldg by 11/15/11.
- 3) Secure at least \$150K for the collaborative and its programs by 12/31/11.
- 4) Develop a public awareness committee to address endorsement process for members by 4/30/11.
- 5) Provide at least 3 asset development webinars for practitioners by 12/15/11.
- 6) Create a website for the coalition by 6/30/11.
- 7) Establish a listserv and regular communication (e-newsletter) by 3/1/11.
- 8) Hold a press conference at the Governor's office in partnership with Senator Liu's office by 3/31/11.

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Senator Carol Liu
21st District

PATHWAYS TO ECONOMIC SECURITY PROGRAM
Statewide Plan

November 2010

California needs 21st Century ideas to confront and resolve the issues associated with poverty. In light of the current economic crisis in California, lawmakers must reduce the number of people living in poverty and the long-term need for safety net services while increasing state economic productivity. Our challenge is to determine what programs, systems, and funding are in place to prevent Californians from falling into poverty; meet the basic needs of those living in poverty, and provide them with a pathway to economic self-sufficiency and a dignified life. Effective and meaningful investment in prevention, safety net, and education and job training programs will pay dividends over the long term by reducing the need for government support and enabling people to become productive, taxpaying members of society.

In order to forge a collective vision, maximize collaboration, and strategically deploy resources, the Senator Carol Liu will undertake to create a Senate Human Services Sub Committee and/or an Advisory Board of six to eight leaders in poverty prevention. This group will be charged with gathering information on the effectiveness of existing programs; identifying best practices in California and other states; and soliciting recommendations from business, the education community, nonprofit and for-profit organizations, state and local government officials, members of the faith community, and others committed to reducing poverty and creating pathways to self-sufficiency. The end result will be an action plan of short- to long-term priority goals, objectives, and outcomes to focus the collaborative work of public, private, nonprofit, and faith-based organizations.

The Governor's interest and participation will be sought and key program directors in the Administration will be asked to collaborate and participate in the Pathways to Economic Security effort. The Senator will reach out to the Chairs of other Committees and Select Committees examining related issues. The committee/advisory board will rely on research support from the Bureau of State Audits, the California Research Bureau, the Legislative Analysts' Office, and the Senate Office of Research. The group will seek funding in order to partner with the Urban Institute to develop a cost/benefit analysis of eradicating poverty in California.

A first step of the effort will be to unite state antipoverty leaders in an immediate campaign to increase participation in the federal EITC. The committee/advisory board will partner with the Governor's office and the Women's, Black, Latino and API Caucuses to accomplish this through community mobilization and public education. The committee/advisory board will simultaneously gather information about other programs available to help individuals move out of poverty by facilitating access to education and job training. The infrastructure created to generate awareness of the federal EITC will subsequently be used to promote programs that assist in the transition out of poverty and help sustain the transition. The group's direction will be based on the belief that the government cannot create economic security without the help of public/private partnerships and that through these mobilization efforts, the committee/ advisory board will identify and unite key stakeholders in an effort that will ultimately lead to more efficient, effective, and coordinated programs.

CALIFORNIA CODES
GOVERNMENT CODE
SECTION 12750-12763

12759 (Page 5)

12750. (a) A community action agency shall be a public or private nonprofit agency that fulfills all of the following requirements:

(1) Has been designated by the director to operate a community action program.

(2) Has a tripartite board structure meeting the requirements of Section 12751.

(3) Has the power, authority, and capability to plan, conduct, administer, and evaluate a community action program, including the power to enter into contracts with other public and private nonprofit agencies and organizations to assist in fulfilling the purposes of this chapter.

(b) A community action program is a locally planned and operated program comprising a range of services and activities having a measurable and potentially major impact on causes of poverty in the community or those areas of the community where poverty is a particularly acute problem.

(c) Component services and activities of a community action program may be administered directly by the community action agency, or by other agencies pursuant to delegation or subcontractual agreements with the eligible entity. They may be projects eligible for assistance under this chapter, or projects assisted from other public or private sources, and they may be either specially designed to meet local needs, or designed pursuant to the eligibility standards of the state or federal program providing assistance to a particular kind of activity that will help in meeting those needs.

(d) For the purpose of this chapter, a community may be a city, county, multicounty or multicounty unit, that provides a suitable organizational base and possesses the commonality of interest needed for a community action program.

12750.1. (a) No new community action agency may be designated by the director for a political subdivision that is served by an existing community action agency unless any of the following exist:

(1) The political subdivision is informed in writing by the director that the existing community action agency has failed to comply, after having a reasonable opportunity to do so, with the requirements of this chapter, subject to paragraph (5) of subdivision (c) of Section 12781.

(2) The political subdivision is informed by its existing community action agency that because of changes in assistance furnished to programs to economically disadvantaged persons it can no longer operate a satisfactory community action program.

(3) The director is petitioned by significant numbers of eligible beneficiaries to reconsider its existing designation and, based on that reconsideration, determines to designate an alternate community action agency.

(b) In the event that the designation of an existing community action agency is revoked, the director shall designate a new community action agency within a period of 90 days after the effective date of the revocation, subject to Section 12750.2.

(c) New community action agency designations may be made in

political subdivisions or combinations of political subdivisions in a county or portion thereof for which no community action agency has been designated provided that the community to be served has a population of at least 50,000, as determined by the Bureau of Census from the most recent available census or survey. The director may waive the general requirement that the community to be served have a population of at least 50,000 in those instances where no practical grouping of contiguous political subdivisions can be made in order to meet that requirement.

(d) A private nonprofit agency that serves a political subdivision or combination of political subdivisions having more than 50,000 population shall be entitled to petition the department for state designation as a community action agency, provided it has a governing board meeting community action agency requirements and has the capability to plan, conduct, administer, and evaluate a community action program.

12750.2. For purposes of serving any area of the state in which community action programs cease to be provided, the director shall designate an organization in accordance with Section 9909 of Title 42 of the United States Code, as amended, and through a process that shall include all of the following:

(a) Notice of intent to designate.

(b) Request for proposals by any political subdivision or by any other qualified organization that can demonstrate adequate representation of low-income individuals in the development, planning, implementation, and evaluation of the community action program.

(c) Invitation to the political subdivision to participate in the review of the proposals.

12751. Each community action agency shall have a board of directors conforming to the following requirements:

(a) One-third of the members of the board are elected public officials, currently holding office, or their representatives, except that if the number of elected officials reasonably available and willing to serve is less than one-third of the membership of the board, membership on the board of appointive public officials may be counted in meeting this requirement.

(b) At least one-third of the members are persons chosen in accordance with democratic selection procedures outlined in regulations promulgated by the department to assure that the members represent the poor and reside in the area served.

(c) The remainder of the members are officials or members of business, industry, labor, religious, human services, education, or other major groups and interests in the community.

12752. The powers of the tripartite governing board of the nonprofit community action agency shall include the power to appoint the executive director, to determine major personnel, fiscal, and program policies, to approve overall program plans and priorities, and to assure compliance with conditions of and approve proposals for financial assistance under this chapter.

12752.1. (a) If a political subdivision or local **government** is designated as a community action agency, it shall do all of the following:

(1) Establish a tripartite advisory or administering board to provide input to the political subdivision or local **government** regarding the activities of the community action agency.

(2) Share with its tripartite board the determination of the community action agency's program plans and priorities.

(3) Provide for the participation of the tripartite board in the selection of the executive director of the community action agency, unless prohibited by local law, city charter, or civil service procedure.

(b) The political subdivision or local **government** may, consistent with general and local law, delegate any or all of the following powers to the tripartite board:

(1) To determine its own rules and procedures and to select its own officers and executive committee.

(2) To determine, subject to the ratification of designating officials, the community action agency's major personnel, organizational, fiscal, and program policies.

(3) To approve, subject to the ratification of designating officials, all program proposals, budgets and subcontractor agreements.

(4) To oversee the extent and the quality of the participation of the poor in the programs of the community action agency.

12753. (a) Each community action agency shall adopt procedures to provide a continuing and effective mechanism for securing broad community involvement in programs assisted under this act and for ensuring that all groups or elements represented on the tripartite board have a full and fair opportunity to participate in decisions affecting those programs.

(b) Community action agencies shall establish procedures under which community agencies and representative groups of the poor that feel themselves inadequately represented on the tripartite board may petition for adequate representation.

12754. In exercising its powers and carrying out its overall responsibility for a community action program, a community action agency shall have, subject to the purposes of this chapter, at least the following functions:

(a) Planning systematically for and evaluating the program, including actions to develop information as to the problems and causes of poverty in the community, determine how much and how effectively assistance is being provided to deal with those problems and causes, and establish priorities among projects, activities, and areas as needed for the best and most efficient use of resources.

(b) Encouraging agencies engaged in activities related to the community action program to plan for, secure, and administer assistance available under this chapter or from other sources on a common or cooperative basis; providing planning or technical assistance to those agencies; and generally, in cooperation with community agencies and officials, undertaking actions to improve existing efforts to overcome poverty.

(c) Initiating and sponsoring projects responsive to needs of the

poor that are not otherwise being met.

(d) Establishing effective procedures by which the poor and area residents concerned will be enabled to influence the character of programs affecting their interests, providing for their regular participation in the implementation of those programs, and providing technical and other support needed to enable the poor and neighborhood groups to secure on their own behalf available assistance from public and private sources.

(e) Joining with and encouraging business, labor, and other private groups and organizations to undertake, together with public officials and agencies, activities, in support of the community action program that will result in the additional use of private resources and capabilities, with a view to things such as developing new employment opportunities, stimulating investment that will have a measurable impact in reducing poverty among residents of areas of concentrated poverty, and providing methods by which residents of those areas can work with private groups, firms, and institutions in seeking solutions to problems of common concern.

12756. Every community action agency has a fundamental responsibility to encourage, assist, and strengthen the ability of the poor in the areas served by the community action agency to play major roles in the organization; program planning; goal setting; determination of priorities; decisions concerning budgeting and financial management; key decisions concerning hiring of personnel, selection criteria, personnel policies, and career development programs; and evaluation of programs affecting their lives. The fundamental responsibility of the community action agency includes all of the following:

(a) Seeking and bringing about ways to improve its own effectiveness as a channel through which the poor, local **government**, and private groups can communicate, plan, and act together in partnership. In that partnership, the poor shall have a strong voice or role, both directly and through representatives whom they have chosen.

(b) Providing the representatives of the poor serving on the tripartite board of the community action agency with the tools and the support, including guidance, training, and staff assistance, that will permit them to participate meaningfully in the affairs of the community action agency, and in all of its programs and subcontractor agencies.

(c) Encouraging the development of effective local organizations established and controlled by residents of poor neighborhoods and areas. Community action agencies are expected to provide training, technical assistance, and staff resources to enable the poor to develop, administer, and participate effectively in local area programs and to enter into the broader community discussion of problems and solutions relating to poverty.

(d) Providing employment for poor persons in all phases of the community action program.

(e) Continually ensuring that subcontractor agencies involve poor persons in the planning, conduct, and evaluation of subcontracted programs.

(f) Working for the acceptance by other public and private agencies and organizations serving the community of effective and growing involvement of the poor in the planning, conduct, and evaluation of all activities that affect them and their inclusion in career jobs in the agencies.

12757. Where a community action agency places responsibility for major policy determinations with respect to the character, funding, extent, and administration of and budgeting for programs to be carried on in a particular geographic area within the community in a subsidiary board, council, or similar agency, such board, council, or agency shall be broadly representative of the area and shall assure adequate opportunity for membership of elected public officials on such board, council, or agency.

12758. (a) All Community Services Block Grant funds made available by Congress shall be used by the state, together with any state funds as may from time-to-time be appropriated for this program, and any funds as may be transferred to this program from other federal block grants, in accordance with the annual Budget Act.

(b) No transfer of funds is permitted, under any circumstance, from the California Community Services Block Grant Program to any other block grant or program administered by the state or by the federal **government**.

12759. (a) For the purposes of this section, the following terms have the following meanings:

(1) "Agency" means a community action agency, limited purpose agency, or other organization that qualifies as an eligible entity pursuant to this chapter and that receives financial assistance from the total program funds, as defined in paragraph (2).

(2) "Total program funds" means the federal Community Services Block Grant funds that remain after the amount reserved pursuant to subdivision (c) is set aside.

(3) "Uncapped program" means a program that serves an uncapped area, as defined in Section 12730.

(b) The director shall allocate federal Community Services Block Grant funds consistent with the following principles:

(1) The historic distinction between minimum and nonminimum funded agencies and other eligible entities shall be minimized and eventually eliminated.

(2) After the target allocation point as set forth in subdivision (c) is achieved, allocation adjustments shall treat all agencies equitably and without regard to minimum funding levels.

(3) If federal Community Services Block Grant funding is reduced or increased, funds shall be allocated so as to avoid abrupt changes in current allocations.

(c) For each fiscal year, the director shall first reserve from the annual federal Community Services Block Grant all amounts that federal or state law allows or requires to be set aside for statewide activities consistent with the purposes of the Community Services Block Grant, including, but not limited to, training, technical assistance, monitoring, coordination, and administration.

(d) (1) The goal of this section is to achieve a target allocation point for each agency. The target allocation for each agency, except uncapped program agencies, shall be either two hundred fifty thousand dollars (\$250,000) or the amount the agency received from the 2005 federal Community Services Block Grant award, whichever is greater. The target allocation point for each uncapped program shall be the amount it received from the 2005 federal Community Services

Block Grant award. An agency with a target allocation point equal to the amount received from the 2005 federal Community Services Block Grant award shall have its target allocation point further adjusted pursuant to paragraph (6).

(2) The director shall first assign an initial base allocation for each agency, except an uncapped program agency, that shall be equal to either one hundred seventy-three thousand five hundred fifty-six dollars (\$173,556) or the amount the agency received from the 2005 federal Community Services Block Grant award, whichever is greater. The director shall assign each uncapped program an initial base allocation that shall be equal to the amount the program received from the 2005 federal Community Services Block Grant award even if it is less than one hundred seventy-three thousand five hundred fifty-six dollars (\$173,556).

(3) From the 2007 federal Community Services Block Grant, the director shall begin by allocating the initial base allocation to each agency. If the total program funds available that year are more than the amount required to fulfill the initial base allocation for all agencies, the allocation shall be adjusted pursuant to paragraph (4). If the total program funds available that year are less than the amount required to fulfill the initial base allocation, the allocation shall be adjusted pursuant to paragraph (5).

(4) Commencing with the 2007 federal fiscal year, if there is an increase in total program funds in any federal fiscal year before the target allocation point is achieved, the additional funds shall be allocated as follows:

(A) First, each agency that is not an uncapped program whose prior year allocation was less than two hundred fifty thousand dollars (\$250,000) shall have its allocation increased until each of those agencies reach the target allocation point of two hundred fifty thousand dollars (\$250,000). The allocations to these agencies shall be prioritized initially to the lowest funded agencies to enable their allocations to, as much as the funding increase allows, float up toward the second lowest funded agencies, and then to this collective group of agencies to enable their allocations to float up toward the next lowest funded agencies, and so on until all of these agencies reach the target allocation point of two hundred fifty thousand dollars (\$250,000).

(B) Second, once the target allocation point of two hundred fifty thousand dollars (\$250,000) is reached pursuant to subparagraph (A), additional funds shall be allocated proportionately among each of the agencies, including uncapped program agencies whose target allocation point equals the amount the agency received from the 2005 federal Community Services Block Grant award, in order to bring its prior year allocation back up to the target allocation point if it was previously reduced pursuant to paragraph (5).

(C) Third, if there are some total program funds remaining during the same federal fiscal year when the target allocation point for all agencies is reached, the remainder shall be allocated to each agency in an amount that bears the same relationship to the total amount of the remainder as the number of persons living in households at or below the poverty level in each agency's respective service area bears to the total number of those persons living in the state, as reported in the most recent available decennial census.

(5) Commencing with the 2007 federal fiscal year, if there is a decrease in total program funds in any fiscal year before the target allocation point is reached, the reduction shall be allocated as follows:

(A) First, the reduction shall be subtracted proportionately from the prior years' allocation of each agency whose initial base

allocation was greater than two hundred fifty thousand dollars (\$250,000).

(B) Second, no agency shall have its current year allocation fall below the current year allocation for any other agency when the other agency's initial base allocation was less than the first agency's allocation. If the reduction in total program funds is greater than can be absorbed among the agencies whose initial base allocations were greater than two hundred fifty thousand dollars (\$250,000), the reductions shall also be applied proportionately among any other agencies necessary to maintain this rule.

(C) Until the target allocation point is reached for all agencies, an agency that is not an uncapped program shall not have its current year allocation fall below one hundred seventy-three thousand five hundred fifty-six dollars (\$173,556). At the discretion of the director, federal Community Services Block Grant discretionary funds may be used for this purpose.

(6) If a new decennial census is reported before the target allocation point is achieved, the director shall first adjust the relative allocation among each of those agencies whose initial base allocation was equal to the amount it received from the 2005 federal Community Services Block Grant award by the percentage difference of the number of persons living in households at or below the poverty level in each agency's respective service area as compared to the number of those persons reported in previous decennial census, except that an agency that is not an uncapped program shall not have the adjustment pursuant to this paragraph reduce its current year allocation below the current year allocations of the lowest funded agencies pursuant to subparagraph (A) of paragraph (4). All allocations made pursuant to paragraphs (4) and (5) shall take this census-based adjustment into account.

(e) (1) Commencing with the first federal fiscal year after the target allocation point is reached, increases and decreases in total program funds for each federal fiscal year shall be proportionately allocated among all agencies relative to the prior year's allocation.

(2) When each decennial census is reported, allocations made pursuant to this subdivision shall also be adjusted by the percentage difference of the number of persons living in households at or below the poverty level in each agency's respective service area as compared to the number of these persons reported in the previous decennial census, except that an agency that is not an uncapped agency shall not have the adjustment pursuant to this subdivision reduce its current year allocation below two hundred fifty thousand dollars (\$250,000).

(f) It is the intent of the Legislature that the allocation formula specified in this section not be used as a formula for other funding distributions.

12760. Community action agencies funded under this article shall coordinate their plans and activities with other eligible entities funded under Articles 7 (commencing with Section 12765) and 8 (commencing with Section 12770) that serve any part of their communities, so that funds are not used to duplicate particular services to the same beneficiaries and plans and policies affecting all grantees under this chapter are shaped, to the extent possible, so as to be equitable and beneficial to all community agencies and the populations they serve.

12761. A community action agency or eligible entity shall not use

any funds received under this article to replace discontinued state or local funding.

12763. Consistent with Section 1090, no Member of the Legislature, or any state, county, district, judicial district, or city officer or employee who also serves on a tripartite board shall vote on a contract or other matter before a tripartite board, that would have a direct bearing on services to be provided by that member, officer, or employee, or any business or organization which that member, officer, or employee directly represents or that would financially benefit that member, officer, or employee, or the business or organization that the member, officer, or employee directly represents.

AMENDED IN ASSEMBLY APRIL 12, 2011

CALIFORNIA LEGISLATURE—2011–12 REGULAR SESSION

ASSEMBLY BILL

No. 6

Introduced by Assembly Member Fuentes

**(Coauthors: Assembly Members Beall, Blumenfield, Dickinson, Hall,
Roger Hernández, Bonnie Lowenthal, Skinner, Solorio, and
Yamada)**

(Coauthor: Senator Pavley)

December 6, 2010

An act to amend Sections 11020, ~~11320.2~~, 11372, 11450, 11450.12, 11450.13, 11451.5, and 18901.4 of, to add Section 18901.2 to, to repeal Chapter 4.6 (commencing with Section 10830) of Part 2 of Division 9 of, and to repeal and add Sections 11004.1, 11265.1, 11265.2, 11265.3, and 18910 of, the Welfare and Institutions Code, relating to public social services.

LEGISLATIVE COUNSEL'S DIGEST

AB 6, as amended, Fuentes. CalWORKs and CalFresh ~~Program~~.

Existing law requires each county to provide cash assistance and other social services to needy families through the California Work Opportunity and Responsibility to Kids (CalWORKs) program using federal Temporary Assistance to Needy Families (TANF) block grant program, state, and county funds.

Existing federal law provides for the federal Supplemental Nutrition Assistance Program (SNAP), known in California as ~~the CalFresh Program~~ *CalFresh*, formerly the Food Stamp Program, under which ~~food stamps~~ *nutrition assistance benefits* allocated to the state by the federal government are distributed to eligible individuals by each county.

(1) Existing law requires the State Department of Social Services and the California Health and Human Services Agency Data Center to design, implement, and maintain a statewide fingerprint imaging system for use in connection with the determination of eligibility for benefits under the CalWORKs program, excluding the Aid to Families with Dependent Children-Foster Care program, and ~~the CalFresh Program~~. Existing law, with specified exceptions, requires applicants for, and recipients of, CalWORKs and CalFresh benefits, as a condition of eligibility, to be fingerprint imaged, pursuant to the statewide fingerprint imaging system.

This bill would repeal these provisions relating to fingerprints and would make related conforming changes.

(2) Under existing law, the county is required to annually redetermine eligibility for CalWORKs benefits. Existing law additionally requires the county to implement a recipient monthly reporting system, consistent with federal law until the Director of Social Services makes a specified declaration, at which time the county would be required to redetermine recipient eligibility and grant amounts on a quarterly basis, using prospective budgeting, and to prospectively determine the grant amount that a recipient is entitled to receive for each month of the quarterly reporting period. Under existing law, a CalWORKs recipient is required to report to the county, orally or in writing, specified changes that could affect the amount of aid to which the recipient is entitled. Under existing law, the CalWORKs quarterly reporting system is also implemented by the State Department of Social Services in administering SNAP.

This bill would repeal the requirements relating to quarterly reporting and prospective determination grant amounts, and would, instead, impose similar requirements for a semiannual reporting period, operative July 1, 2012, to be implemented no later than January 1, 2013, except as prescribed. The bill would also require the department to establish an income reporting threshold for CalWORKs recipients, as specified. The bill would make various related conforming changes, including revising provisions relating to the collection of CalWORKs grant overpayments and ~~self-sufficiency review requirements~~. The bill would authorize counties to adopt staggered semiannual reporting requirements, as specified. The bill would authorize the department to implement the semiannual reporting provisions through all-county letters until the adoption of implementing regulations, as prescribed.

(3) This bill would, to the extent permitted by federal law, require the State Department of Social Services, in conjunction with the ~~State~~

Department of Community Services and Development, to design, implement, and maintain a utility assistance initiative, under which the State Department of Social Services would be required to grant applicants and recipients of CalFresh benefits a nominal ~~Low Income Home Energy Assistance Program (LIHEAP)~~ benefit *Home Energy Assistance Program (HEAP) benefit*, as specified.

(4) Existing law continuously appropriates moneys from the General Fund to defray a portion of county costs under the CalWORKs program.

This bill would, instead, provide that the continuous appropriation would not be made for purposes of implementing the bill.

(5) To the extent that the bill would expand eligibility for CalWORKs and CalFresh benefits, the bill would create a state-mandated local program.

The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that, if the Commission on State Mandates determines that the bill contains costs mandated by the state, reimbursement for those costs shall be made pursuant to these statutory provisions.

Vote: majority. Appropriation: no. Fiscal committee: yes.
State-mandated local program: yes.

The people of the State of California do enact as follows:

1 SECTION 1. Chapter 4.6 (commencing with Section 10830)
2 of Part 2 of Division 9 of the Welfare and Institutions Code is
3 repealed.

4 SEC. 2. Section 11004.1 of the Welfare and Institutions Code
5 is repealed.

6 SEC. 3. Section 11004.1 is added to the Welfare and
7 Institutions Code, to read:

8 11004.1. (a) In addition to Section 11004, this section shall
9 apply to the CalWORKs program.

10 (b) The amount of any CalWORKs grant overpayment shall be
11 the difference between the grant amount the assistance unit actually
12 received and the grant amount the assistance unit would have
13 received under the semiannual reporting, prospective budgeting
14 system if no county error had occurred and if the recipient had
15 timely, completely, and accurately reported as required under

1 ~~SEC. 18.~~

2 *SEC. 19.* Section 18901.2 is added to the Welfare and
3 Institutions Code, to read:

4 18901.2. The Legislature finds and declares all of the following:

5 (a) Many California families struggle with high rent and utility
6 costs, straining their household's financial resources and often
7 limiting resources for food purchases.

8 (b) A number of other states have taken action to reduce these
9 struggles by implementing a "Heat and Eat" program that alleviates
10 the burden of high energy and shelter costs by maximizing federal
11 nutrition benefits, and consequently reducing paperwork.

12 (c) It is the intent of the Legislature to create a program in
13 California that provides a nominal ~~Low Income Home Energy~~
14 ~~Assistance Program (LIHEAP)~~ *benefit Home Energy Assistance*
15 *Program (HEAP) benefit, through the Low-Income Home Energy*
16 *Assistance Program (LIHEAP) block grant*, to all applicants and
17 recipients of the CalFresh Program so that some households may
18 experience an increase in federal nutrition benefits and benefit
19 from paperwork reduction.

20 (d) To the extent permitted by federal law, the State Department
21 of Social Services shall, in conjunction with the State Department
22 of Community Services and Development, design, implement, and
23 maintain a utility assistance initiative.

24 (e) In implementing and maintaining the utility assistance
25 initiative, the State Department of Social Services shall do all of
26 the following:

27 (1) (A) Grant all applicants and recipients of CalFresh benefits
28 pursuant to this chapter a nominal ~~Low Income Home Energy~~
29 ~~Assistance Program (LIHEAP)~~ *Home Energy Assistance Program*
30 *(HEAP) benefit* out of the federal Low-Income Home Energy
31 Assistance Program block grant (42 U.S.C. 8621 et seq.).

32 (B) In establishing the ~~LIHEAP~~ *HEAP* benefit amount, the
33 department shall take into consideration that the benefit level need
34 not provide significant utility assistance.

35 (2) Provide the ~~LIHEAP~~ *HEAP* benefit without requiring the
36 applicant or recipient to provide additional paperwork or
37 verification.

38 (3) To the extent permitted by federal law and to the extent
39 federal funds are available, provide the ~~LIHEAP~~ *HEAP* benefit
40 annually to each recipient of CalFresh benefits.

(4) Deliver the ~~LHHEAP~~ *HEAP* benefit using the Electronic Benefit Transfer (EBT) system or other nonpaper delivery system.

(5) Ensure that receipt of ~~LHHEAP~~ *HEAP* benefits pursuant to this section shall not disqualify the applicant or recipient of CalFresh benefits from receiving other ~~LHHEAP~~ *HEAP* benefits or other utility benefits for which they qualify.

(f) To the extent permitted by federal law, a CalFresh household receiving or anticipating receipt of ~~LHHEAP~~ *HEAP* benefits pursuant to the utility assistance initiative or any other law shall be entitled to use the full standard utility allowance (SUA) for the purposes of calculating CalFresh benefits. A CalFresh household shall be entitled to use the full SUA regardless of whether the ~~LHHEAP~~ *HEAP* benefit is actually redeemed.

(g) The department shall implement the initiative by January 1, 2013.

~~SEC. 19.~~

SEC. 20. Section 18901.4 of the Welfare and Institutions Code is amended to read:

18901.4. (a) Effective July 1, 2010, the department shall propose a Transitional Food Stamps for Foster Youth demonstration project under which independent foster care adolescents, as defined in Section 1905(w)(1) of the federal Social Security Act (42 U.S.C. Sec. 1396d(w)(1)) who are not eligible for CalWORKs or ~~Supplementary~~ *Supplemental* Security Income program benefits, shall be eligible without regard to income or resources, subject to federal law authorizing demonstration projects pursuant to Section 2011 and following of Title 7 of the United States Code.

(b) An individual eligible for the program proposed pursuant to this section shall receive the maximum benefit amount allotted for a household size of one for the initial certification period, which shall remain constant for the entirety of the initial certification period. The food stamp case shall be established and maintained in the county of jurisdiction designated by the terminating foster care case.

(c) The demonstration project proposed pursuant to this section shall maximize access to benefits and minimize interim reporting requirements during the certification period.

(d) Not later than March 1, 2010, the department shall seek all necessary federal approvals to implement this section as a

1 demonstration project for these beneficiaries. This section shall
2 be implemented only to the extent that federal financial
3 participation is available.

4 (e) The department shall implement this section by an all-county
5 letter (ACL) or similar instruction from the director and shall adopt
6 regulations as otherwise necessary to implement this section no
7 later than January 1, 2011.

8 ~~SEC. 20.~~

9 *SEC. 21.* Section 18910 of the Welfare and Institutions Code
10 is repealed.

11 ~~SEC. 21.~~

12 *SEC. 22.* Section 18910 is added to the Welfare and Institutions
13 Code, to read:

14 18910. (a) To the extent permitted by the federal Food Stamp
15 Act, including Section 2015(c) of Title 7 of the United States Code,
16 implementing regulations, and any waivers obtained by the
17 department pursuant to subdivision (g) of Section 11265.2, the
18 department shall implement a prospective budgeting, semiannual
19 reporting system for recipients of CalFresh benefits.

20 (1) CalFresh households that also receive CalWORKs benefits
21 shall be subject to the CalWORKs semiannual reporting procedures
22 established in Sections 11265.1, 11265.2, and 11265.3.

23 (2) CalFresh households not receiving CalWORKs shall not be
24 required to report within the semiannual reporting period unless
25 specifically required by federal food stamp law. Otherwise,
26 CalFresh households not receiving CalWORKs shall be subject to
27 semiannual reporting procedures established in Sections 11265.1,
28 11265.2, and 11265.3, excluding the CalWORKs income reporting
29 threshold and any provisions not permitted under federal food
30 stamp law, regulation, or waivers obtained by the department
31 pursuant to subdivision (g) of Section 11265.2.

32 (b) For recipients of CalFresh benefits who also are Medi-Cal
33 beneficiaries and who are subject to the Medi-Cal midyear status
34 reporting requirements, counties shall seek to align the timing of
35 reports required under this section with midyear status reports
36 required by the Medi-Cal program.

37 (c) The requirements of subdivisions (h) and (i) of Section
38 11265.1 and subdivision (g) of Section 11265.2 shall apply to the
39 implementation of this section.

The CalFresh Act of 2011:



Finding Resources & Eliminating Significant Hurdles

Contact: George Manalo Le-Clair at george@cfpa.net | 510-433-1122 x 103
or Alexis Fernández at alexis@cfpa.net | 510-433-1122 ext. 111

The CalF-R-E-S-H Act of 2011 seeks to increase access to and participation in CalFresh by removing barriers and simplifying the application process, while simultaneously implementing cost savings efforts. About 50% of eligible Californians do not participate in the program, ranking California second to last among states on measures of program participation. Increasing participation levels to near 100% of eligible households, as other states have done, could mean an additional \$4.9 billion in federal benefits for needy Californians. Moreover, increasing participation has the potential to benefit all Californians through the more than \$8.7 billion in economic activity associated with these lost federal benefits.

» Less Paper, More Food; Move to Semi-annual Reporting

California is the last state using a quarterly reporting system for CalFresh. The USDA has long supported the use of semi-annual reporting as experience in other states has shown that semi-annual reporting can decrease burdens and simplify rules for clients, reduce administrative workload, and improve program accuracy. Quarterly reporting is not only costly and burdensome to the state, but also contributes to the barriers in access faced by needy California families. This proposal would move CalFresh and CalWORKs' reporting periods from quarterly to semi-annual and would adjust the CalWORKs income reporting threshold (IRT); improving access to critical nutrition assistance and maintaining reporting alignment between the two programs.

» Fight Fraud *and* Feed Families; Eliminate the Statewide Fingerprint Imaging System (SFIS)

California is one of just three remaining states and one city that require all adult members of CalFresh households to provide a finger and photo image in order to get benefits. The requirement is aimed at preventing duplicate-aid fraud, though other effective and more efficient fraud detection measures are also in place. At a cost of about \$17 million each year, finger imaging simply adds a major hassle to an already lengthy and intimidating CalFresh application process. A recent audit by the Bureau of State Audits shows that given the miniscule amount of multiple-aid fraud, the state cannot justify the tens of millions of dollars it spends on the implementation and annual operation of this system. Citing concerns about participation (a 2009 USDA report indicates that participation may be 7% lower in states that use finger imaging) USDA has barred additional states from implementing the practice.

» Fewer Bills, More Benefits; Implement a Heat and Eat Initiative

A utility assistance or "Heat and Eat" initiative is based on a partnership between the Department of Social Services, which administers CalFresh, and the Department of Community Services and Development, which administers the state Low Income Home Energy Assistance Program (LIHEAP). Under such an initiative all CalFresh households would receive a nominal energy assistance benefit through LIHEAP qualifying them to automatically receive the standard utility allowance (SUA), currently \$320, for the purpose of calculating CalFresh benefits. The nominal benefit would be delivered through a non-paper driven system, such as Electronic Benefit Transfer (EBT) and would not require any additional paperwork or verification on behalf of the CalFresh applicant. Such an initiative would allow households who had not previously claimed the SUA to claim higher shelter costs and the related income deductions. The resulting change in benefit calculations would increase benefits for some households and remove the verification requirements associated with utility costs for all households. Thus simplifying the application process and leveraging additional federal nutrition benefits for CalFresh households.

**COMMUNITY SERVICES BLOCK
GRANT PROGRAM**

Information Memorandum

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Division of State Assistance
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447
<http://www.acf.gov/programs/ocs/csbq>

Transmittal No. 123

Date: May 4, 2011

TO: State Community Services Block Grant (CSBG) Administrators; U.S. Territory Administrators; Administrators for CSBG-Eligible Entities; Members of Tripartite Boards for CSBG-Eligible Entities; State Community Action Agency (CAA) Associations; and National CSBG Training and Technical Assistance (T/TA) Providers

SUBJECT: Reorganization of CSBG T/TA Resources – A New Strategy for Excellence

PURPOSE: To share the Office of Community Services' (OCS) new strategic approach to achieve excellence in the CSBG T/TA program and related activities.

RELATED REFERENCES: Community Services Block Grant Act (Public Law 105-285, the Community Opportunities, Accountability, and Training and Educational Services Act of 1998)

This Information Memorandum (IM) provides background on the new strategy of the Office of Community Services (OCS) for the Community Services Block Grant (CSBG) Training and Technical Assistance (T/TA) Program during Fiscal Year (FY) 2011. A description of the FY 2011 strategic approach is provided outlining necessary considerations to more efficiently utilize and leverage the available CSBG T/TA resources. This IM also provides background on statutory requirements regarding how OCS will carry out its compliance and T/TA responsibilities for the CSBG program.

Note: This IM includes information that relates to the statutory requirements regarding the distribution of T/TA funds. Key sections of the CSBG Act are referenced throughout the IM. It is strongly recommended that the referenced sections of the CSBG Act be read along with this guidance in order to assure an understanding of the specific language of the statute. The CSBG Act may be obtained online at the following web address:
http://www.acf.hhs.gov/programs/ocs/csbq/pdf/csbq_law_508.pdf.

Background

The CSBG network consists of several types of organizations that administer and/or support services designed to eliminate the causes and conditions of poverty in the United States. These organizations include: 1) State CSBG Agencies that act as the lead agency for purposes of administering CSBG; 2) State Community Action Agency (CAA) Associations that provide T/TA to increase the capacity of local CSBG-eligible entities to carry out the mandate of the CSBG Act and measure results; 3) CSBG-eligible entities that create, coordinate and deliver programs and services to low-income communities; and 4) national CSBG partners that provide T/TA in the areas of data collection, legal issues, financial management, administrative governance, and performance measurement.

The historic CSBG T/TA infrastructure evolved over many years in response to a variety of administrative needs and program priorities. This T/TA infrastructure featured a wide range of grant activities and a large number of grantees nationwide. The approach has supported small

technical assistance projects (typically under \$75,000 per grant) administered by State CAA Associations in almost every State of the nation; crisis intervention activities that targeted a small number of local agencies; and specialized technical assistance projects that reflected the priorities of prior administrations (e.g., Healthy Marriage and Earned Income Tax Credit). Having such a diverse T/TA grant portfolio with a large number of small grants allowed customization at the State and local levels, but also created significant administrative and coordination challenges due to the large number of grantees, work plans, and organizational priorities.

While many States and communities have made effective use of CSBG T/TA support to improve and disseminate useful service approaches, OCS has identified a need for enhanced coordination of national technical assistance efforts and improved information on the results of technical assistance in terms of improved service delivery, targeting of resources based on local needs and outcomes, and risk mitigation to assure appropriate expenditure of funds.

Significant progress has already been made in strengthening national technical assistance efforts. For example, although the complexity of CSBG T/TA administrative activities was increased as a result of the American Recovery and Reinvestment Act of 2009 (ARRA), the ARRA funds also provided an opportunity to promote innovative practices and new evaluation activities which will form the basis for future improvements in CSBG. OCS supported exemplary practice work groups and supplemental projects at State CAA Associations, which are helping to identify and disseminate information on best practices in areas such as job creation, community economic development, benefits enrollment coordination, and asset development. Using the achievements of the CSBG network under ARRA as a foundation for future work, OCS believes that the future T/TA efforts can be made more effective through enhanced communication structures, reduced duplication of effort, and improved coordination between national technical assistance providers, State CAA Associations, and local CSBG service providers.

Use and Distribution Requirements for CSBG T/TA Funds

The CSBG Act specifies use and distribution requirements for CSBG T/TA funds.

Use Requirements – The CSBG Act provides specific guidance on the amount of funds available for T/TA. Under Section 674(b)(2) the HHS Secretary is required to reserve not less than one and one half percent of appropriated CSBG funds for training, technical assistance, planning, evaluation, and performance measurement, to assist States in carrying out corrective action activities and monitoring (to correct programmatic deficiencies of eligible entities), and for reporting and data collection activities.

Distribution Requirements – The CSBG Act prescribes distribution requirements for T/TA funds. Under Section 674(b)(2)(A) and Section 678A(c)(2) of the CSBG Act, of the T/TA appropriation under Section 674(b)(2) of the CSBG Act, not less than half of the funds must be “distributed directly to eligible entities, or Statewide or local organizations or associations, with demonstrated expertise in providing training to individuals and organizations on methods of effectively addressing the needs of low-income families and communities.”

National Strategy for Excellence in CSBG T/TA Program

Over the past 30 years, the standards and expectations for management of Federal programs have changed significantly. This increased attention to accountability, transparency, and performance outcomes demands the most efficient and effective use of CSBG T/TA resources. OCS believes that the new strategy for excellence in the CSBG T/TA program requires a restructuring of the current technical assistance approach to focus on coordination of national technical assistance organizations with regional consortia of State technical assistance organizations. The goal is to create a structure that is more manageable, and that will promote improved and more efficient coordination among our national technical assistance providers and the State CAA Associations through a regional approach based on the 10 service regions of the Administration for Children and Families’ (ACF).

In order to more efficiently utilize and leverage the available CSBG T/TA resources, OCS has developed a new strategic approach to streamlining the CSBG T/TA resources that will encourage interoperability among the T/TA grant recipients. OCS will implement a national strategic approach that includes a focus on the following four priority areas:

- 1. Performance Management and Data** – OCS will work with national technical assistance partners and State CSBG lead agencies to build upon the performance management structure developed through the Results Oriented Management and Accountability (ROMA) system and the current National Performance Indicators (NPI) that are used to assess program performance.
- 2. Governance and Legal Technical Assistance** – OCS will coordinate ongoing assistance to States and local entities to plan for routine governance and legal compliance issues faced by the majority of CSBG-eligible entities. For example, ongoing technical assistance will focus on board governance, human resource planning, and financial management standards necessary for high quality program administration in CSBG-eligible entities.
- 3. Risk Mitigation and Quality Assurance** – OCS will continue to focus significant attention on assessing and mitigating risks within CSBG, primarily focused on local entities with significant performance deficiencies, such as significant audit issues, lack of corrective action based on audit findings and State monitoring findings, Board compliance issues, failure to submit appropriate performance information, lack of documentation for services delivered, or other significant management concerns. The goal of OCS efforts will be to assist States in identifying agencies with the most significant performance issues and assuring appropriate corrective actions.
- 4. Centers of Excellence** – OCS will support national Centers of Excellence focused on identifying and disseminating exemplary practice models for specific service areas. For example, OCS currently supports a national technical assistance project focused on community economic development. The goal of CSBG Centers of Excellence will be to support a focus on evidence-based services to support reduction of poverty, revitalization of low-income communities, and empowerment of low-income families and individuals to become fully self-sufficient.

This national approach will begin with current national grantees for data collection, risk mitigation, performance management, governance, legal technical assistance, and community economic development. In addition, for FY 2011, OCS plans to support one new Center of Excellence focused on leadership development. The Leadership Development Center of Excellence (LDCE) will serve as a national Center of Excellence for high-quality and relevant leadership development T/TA information and resources, and develop a recommended approach for talent management within CSBG-eligible entities. These efforts are designed to ensure that CSBG-eligible entities are prepared for transition into the next decade with the strongest talent available. This new effort will focus on developing program leaders with the appropriate range of skills (e.g., public administration, strategic planning, succession planning, financial management, human resource development, community relations, cultural competence, and performance evaluation) necessary for management of complex non-profit and public entities according to the high standards necessary for oversight of public funds. Key elements of the LDCE will include: 1) toolkits and resource guides for succession planning; 2) workshops and webinars for human resource development planning; and 3) support for State and regionally based leadership development programs conducted through State CAA Associations and regional consortia.

CSBG Regional Performance and Innovation Consortia

OCS will establish 10 Regional Performance and Innovation Consortia (RPIs) that support an enhanced State, regional, and national T/TA strategy for the coordination, collaboration, and innovation in the CSBG program. The RPIs will serve as regional focal points to lead the development of a comprehensive and integrated system of T/TA capacity-building activities with core functions of T/TA coordination and information dissemination. The geographic locations of RPIs will be consistent with the 10 ACF Regions. The ACF Region Map may be obtained online at the following web address: http://www.acf.hhs.gov/programs/oro/regions/acf_regions.html.

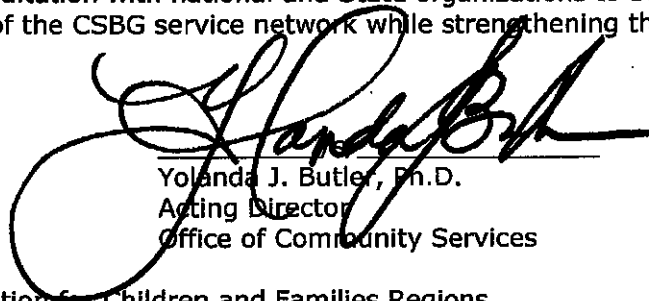
RPIs will coordinate activities designed to strengthen the ability of State CAA Associations to leverage resources; promote and sustain relationships between State CAA Associations and the corresponding State CSBG Lead Agencies; and increase the capacity of State CAA Associations to address the broad T/TA needs of CSBG-eligible entities. The RPI Consortia grantees are expected to include direct funding support for State CAA Associations in each region as well as regionally based coordination efforts. RPIs will work in partnership with OCS and established national technical assistance centers focused on performance management, governance, legal compliance, and risk mitigation and quality improvement. In addition, the RPIs will support promotion of innovative practices through collaboration with national CSBG Centers of Excellence focused on areas such as community economic development and leadership development in the CSBG network.

National technical assistance providers, including new Centers of Excellence, will be required to collaborate with the regional consortia (i.e., RPIs) of State CAA Associations and with other national technical assistance providers to assist in the design of regionally focused leadership recruitment, talent retention, and leadership development programs to meet the needs of CSBG-eligible entities in each ACF geographic region. This approach will help in tailoring leadership development efforts to differing job markets and economic situations in each region, and help extend the impact of the center of excellence.

Conclusion

ACF has established as its goal to work as seamlessly as possible across programs and with other Federal partners, States, Tribes, and grantees to eliminate unnecessary service barriers and enhance efforts to serve individuals, families and communities in an integrated manner. In support of ACF, the Office of Community Services' (OCS) new strategy for excellence in the CSBG T/TA program accounts for necessary considerations to more efficiently utilize and leverage the available T/TA resources. However, OCS will ensure that the new strategic approach continues to adhere to the use and distribution requirements of CSBG T/TA funds through the direct support of CSBG-eligible entities and local or statewide organizations or associations.

The Office of Community Services (OCS) appreciates the extraordinary efforts the CSBG network has made to address the needs of individuals, families and communities affected by the nation's economic crisis. While the restructuring of the CSBG T/TA program will present significant challenges, OCS will seek consultation with national and State organizations to build upon and sustain the current strengths of the CSBG service network while strengthening the foundation for future service improvements.



Yolanda J. Butler, Ph.D.
Acting Director
Office of Community Services

Attachment: List of Administration for Children and Families Regions

ATTACHMENT List of Administration for Children and Families Regions

Regions	States	Territories	Regional Offices
I	Connecticut Maine Massachusetts New Hampshire Rhode Island Vermont		Boston
II	New York New Jersey	Puerto Rico Virgin Islands	New York City
III	Delaware District of Columbia Maryland Pennsylvania Virginia West Virginia		Philadelphia
IV	Alabama Florida Georgia Kentucky Mississippi North Carolina South Carolina Tennessee		Atlanta
V	Illinois Indiana Michigan Minnesota Ohio Wisconsin		Chicago
VI	Arkansas Louisiana New Mexico Oklahoma Texas		Dallas
VII	Iowa Kansas Missouri Nebraska		Kansas City
VIII	Colorado Montana North Dakota South Dakota Utah Wyoming		Denver
IX	Arizona California Hawaii Nevada	American Samoa Guam Mariana Islands Marshall Island Micronesia Palau	San Francisco
X	Alaska Idaho Oregon Washington		Seattle